



**MRID  
NUMBER**

428562-00



## Agriculture Division

July 15, 1993

Miles Inc.  
8400 Hawthorn Road  
P.O. Box 4913  
Kansas City, MO 64120-0013  
Phone: 816 242-2000

Mr. Dennis H. Edwards, Jr.  
Product Manager (19)  
Registration Division (H7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

Subject: NTN 33893 (Imidacloprid)

Pesticide Application for GAUCHO 240 Flowable Seed Treatment  
Insecticide

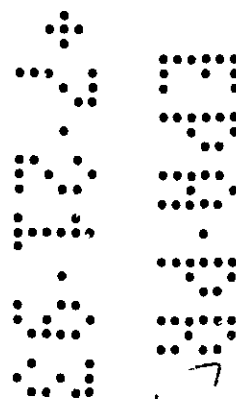
Dear Mr. Edwards:

The undersigned, Miles Inc. Agriculture Division, submits the enclosed application to register GAUCHO 240 Flowable Seed Treatment Insecticide as an end-use product for use on cotton. An earlier petition submitted October 30, 1992 (3F4169/3H5655) proposed the corresponding tolerances for imidacloprid, i-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.

In explanation, on 11/04/92 Miles submitted applications for the registration of granular and foliar uses of NTN 33893 (imidacloprid) on cotton. Also, at that time, Miles submitted Pesticide Petition and Food Additive Petition 3F4169/3H5655 to establish the appropriate tolerances for imidacloprid and its metabolites in/on cotton and its various commodities. Additionally, Miles informed the Agency that we were developing a cotton seed treatment and would be submitting it at a later time.

Miles has applied for the registration of other pesticide products containing NTN 33893, including the first food uses of NTN 33893 (submitted to the Agency 11/4/92). Specifically, these products and their EPA File Symbols are:

<u>Product</u>	<u>EPA File Symbol</u>
NTN 33893 Technical	3125-URU
NTN 33893 75% Concentrate	3125-URL
MERIT 2 (formerly NTN 33893 2)	3125-URI
MERIT 2.5% G (formerly NTN 33893 2.5% Granular	3125-URT
MERIT 0.62% G (formerly NTN 33893 0.62% Granular	3125-URA
CONFIDOR 2 Flowable	3125-UEE
CONFIDOR 2.5 Granular	3125-UEG
ADMIRE SOLUPAK	3125-pending

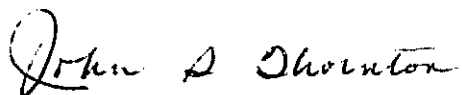


Please note, GAUCHO 240 Flowable is the same chemical formulation as MERIT 2 (NTN 33893 2) and CONFIDOR 2.

If you have any questions concerning this submission, please contact Ms. Karen Cain (816/242-2838).

Yours very truly,

MILES INC.  
AGRICULTURE DIVISION

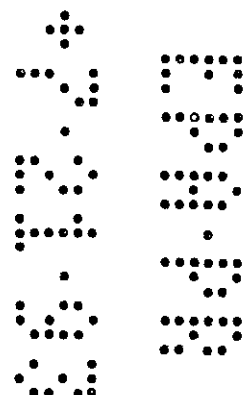


John S. Thornton  
Manager, Registrations

JST:KSC:brh

Enclosures:

- (1) Application for registration of GAUCHO 240 Flowable
- (2) GAUCHO 240 Flowable draft label dated 7/12/93 (5 copies)
- (3) List of data requirements pursuant to 40 CFR 158 for imidacloprid
- (4) Transmittal document and supporting data
- (5) Certification with Respect to Citation of Data



TRANSMITTAL DOCUMENT

1. Name and Address of Submitter:

MILES INC.  
AGRICULTURE DIVISION  
P.O. Box 4913  
Kansas City, MO 64120

*John S. Thornton*

John S. Thornton  
Manager, Registrations  
(816) 242-2255

2. Regulatory Action in Support of Which This Package is Submitted:

The registration of GAUCHO 240 Flowable containing a new active ingredient - NTN 33893 for seed treatment use on cotton. Regulatory actions on this active ingredient have been assigned to Mr. Dennis H. Edwards, Jr., Product Manager 19, Registration Division.

3. Transmittal Date:

July 15, 1993

4. List of Submitted Studies:

MRID No.

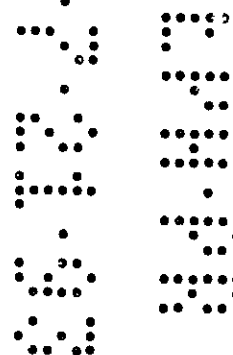
Study No.

428562φ1

1. "Cage and Flight Pen Evaluation of Avian Repellency and Hazard Associated With Imidacloprid-Treated Rice Seed," No EPA Guideline, Miles Report No. 105030, M.L. Avery, D.G. Decker, D.L. Fischer, 57 p.

428562φ2

2. "Avian Risk Assessment for GAUCHO 240 Flowable Systemic Seed Treatment Insecticide Applied to Cotton Seeds," No EPA Guideline, Miles Report No. 105188, D.L. Fischer



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**END**